

DM 05-172 Data Requests Set 3
Topic Two – Joint Ownership Responsibilities for O&M
Set Number One
Staff of the New Hampshire Public Utilities Commission
February 7, 2006

Staff 3-1

All: By work area and for the years 2000-2005 inclusive, please supply the yearly average of:

- a) The number of poles you are responsible for.
- b) The number of poles in inventory by length and class
- c) The total number of new poles set each for maintenance replacements, new construction requests by customers, and new construction/replacements for public works projects.

Staff 3-2

All: When you set a new pole for new construction, a new pole for construction of public works projects, and a new pole beside an existing pole as a maintenance project, please describe the accounting process used for placement into rate base.

Staff 3-3

All: For the same conditions as stated in Request #3 above, please describe your process for removing poles from rate base.

Staff 3-4

All: For the years 2000 through 2005 inclusive, please supply by work area:

- a) The number of line/construction (not repair or installation) crews assigned to New Hampshire at the beginning of the year
- b) The percentage of their time budgeted to New Hampshire
- c) The percentage of their time charged to New Hampshire at year end.

Staff 3-5

Verizon only:

- a. Upon receipt of a proper notification from a joint owner regarding new construction and a request to set a pole in Verizon's maintenance area, if Verizon is unable to respond to the request in a timely manner (i.e., within 60 days of receipt of the request) would Verizon allow the joint owner to set the pole and bill Verizon? If yes, how should the cost of this service be established? If no, why not? How long would the joint owner have to wait, after a proper notification, before Verizon would allow them to set the pole?
- b. If the time required for Verizon to respond to the request was in excess of 60 days, and such delay was the direct and sole cause to the other joint owner of additional costs, would Verizon accept any responsibility for these costs? If not,

why not? How long would the delay have to be, and how often would such delays have to occur, before Verizon would agree to accept financial responsibility for costs of the delay?

Staff 3-6

All: Do your individual pole setting objectives (response to Staff 1-34) include loading the pole and travel time?

Staff 1-7

All: What is the average time it takes for a work order for a single pole to be written, issued, scheduled and set in your maintenance area, and are there intervals between any of the functions listed that make estimating an average difficult or impossible?

Staff 3-8

Verizon only: What can you do to reduce the long lead times required to set poles in your maintenance areas?

Staff 3-9

All: For the years 2000 through 2005 inclusive, has any entity on which you depend to set poles for what you would consider normal work, delayed your requested installation schedules? If so, please list each occurrence by year and the duration of each delay.

Staff 3-10

All: With regard to transferring equipment to a new pole from an existing location, please describe the process on how you include third party (defined as all others except electric and telephone) entities into the process. As part of your response, describe any problem areas encountered.

Staff 3-11

All: Please supply your policy regarding the lashing of your facilities to other facilities owned by you and other facilities owned by others to maintain National Electrical Safety Code clearance requirements.

Staff 3-12

Verizon only: In several operating agreements with the electric companies, Verizon is responsible for removing a pole in the electric company maintenance area once it has been notified of the electric company transfer and more than 60 days have elapsed. Of the 2149 outstanding poles to be removed in the electric maintenance area (response to Staff 1-15), please estimate how many poles will Verizon be removing due to the conditions described above?

Staff 3-13

Verizon only: Does the 60-day clock described in the question above start when the electric company has transferred and sent you notice, or does it start when all of the licensees have completed transfers?

Staff 3-14

Verizon only: Do you find that few, many or most pole replacements present the need to notify licensees to transfer at the time Verizon is ready to transfer? Please support your answer with any data or studies.

Staff 3-15

All: Do your pole inventories contain records of which licensees are attached to your poles? If yes, please provide the information.

Staff 3-16

All: Do you require licensees to tag their facilities on a pole? Do you enforce the policy? Please describe your enforcement procedures.

Staff 3-17

Electric only: Do you notify licensees that poles are ready to transfer or do you rely on Verizon to do so?

Staff 3-18

All: Are you satisfied with your current transfer notification process or can it be improved? Do you think it would be beneficial to establish an electronic transfer notification database shared between pole owners and licensees?

Staff 3-19

Verizon only: What other methods or processes can be introduced to reduce the time it takes to transfer and remove a pole?

Staff 3-20

Verizon only: Verizon had an agreement with the NHPUC Staff where it agreed to remove 400 more poles from its system backlog than the number of new poles set on its system including replacements and new construction. For each year beginning with the first year of the agreement through 2005 inclusive, please supply the total number of new poles set for all reasons and the number of poles removed. If in any year, the number of poles removed does not meet the 400 more than installed requirement, please explain why the agreement was not met. As part of your response, please include any efforts in the following year to “make up the difference”.

Staff 3-21

All: For the years 2000 through 2005 inclusive, please list all the public works jobs where poles were not removed, set, or moved in the time frame originally requested. As part of your response state how late the requested work was and the reason for the delay.

Staff 3-22

All: Please supply a copy of your policy of discarding old poles that have been removed from service. If you consider the old pole an environmental hazard requiring specific disposal techniques, please indicate whether your company has, does, or will, cut an old pole (T or D) at the ground line to facilitate economic removal of the pole.

Staff 3-23

Verizon only: Reference your response to Staff 1-15: Please identify the subset of poles that are pending Verizon NH transfers within Verizon's maintenance area. How many of these transfers have been pending in excess of 60 days? 90 days? 180 days? One year? Two years?

Staff 3-24

Verizon only: Reference your response to Staff 1-15: Please identify the subset of poles that are pending Verizon NH transfers within maintenance areas other than your own. How many of these transfers have been pending in excess of 60 days? 90 days? 180 days? One year? Two years?

Staff 3-25

All: Have any serious discussions occurred between Verizon and the electric companies concerning maintenance trimming responsibilities in the joint operating practices and the need to change those agreements to reflect individual company trimming policy?

Staff 3-26

Verizon only: For the years 2000 through 2005 inclusive, please supply;

- a) The number of requests for approval of danger tree removal
- b) The average time it took to approve the request (date of receipt to approval transmittal date)
- c) The number of requests for shared payment of danger tree removal received
- d) The average payment time from (date of receipt from payment request to check transmittal date)

Staff 3-27

All: Does your company have a maintenance trimming program, including standards, policies, criteria for maintaining line clearances, controlling vegetation and tree contact? If yes, please provide a copy. If no, please explain why your company does not have such a program.

Staff 3-28

All: Please provide a summary by year, for each of the past 5 years, of your expenditures for maintenance tree trimming (i.e., trimming not associated with additions, extensions, overlashing, construction or reconstruction). Please include in this summary the number of miles trimmed in each year.

Staff 3-29

All: When performing trimming of joint lines, what standards or specifications are used for line clearances? (In other words, how much is cut?)

Staff 3-30

All: Does your company perform maintenance trimming of service lines to customer homes? If a customer calls requesting that its service line be trimmed, what is your response?

Staff 3-31

All: How many miles of overhead line does your company own and maintain in your New Hampshire service area(s)?

Staff 3-32

Verizon only: Is the cost of trimming associated with the FTTP program considered by Verizon to be “maintenance” or “construction” trimming?

Staff 3-33

Verizon only: How does Verizon determine whether to participate financially in maintenance trimming on joint pole lines? Please list all criteria which must be met in order for Verizon to agree to divide the cost of maintenance trimming undertaken by an electric utility on jointly owned lines.

Staff 3-34

Verizon only: Please describe your understanding of the need for tree trimming to maintain line clearances in order to protect and maintain the integrity of your own facilities, as well as the facilities of other parties attached to the poles.

Staff 3-35

Verizon only: Please reference IOP #17 of the Intercompany Operating Procedures between Verizon and Unitil. Please explain how Verizon determines whether or not it will benefit from Joint Tree Trimming.

Staff 3-36

Verizon only: Does Verizon ever perform maintenance trimming (i.e., trimming not associated with additions, extensions, overloading, construction or reconstruction) on joint owned lines? If yes, under what circumstances? Is this trimming coordinated with electric companies to maximize benefits and achieve efficiencies?

Staff 3-37

All: What is your company’s legal liability at a double pole location if an accident occurs involving one or both of the poles in place?

Staff 3-38

Verizon only: When Verizon is informed by another joint owner to: a) replace a pole in Verizon’s maintenance area due to the discovery that the pole was damaged and temporarily made secure by that joint owner; b) replace anchors due to the discovery that the anchors are pulling out or are corroded, resulting in potential sag or low wires; or c) perform a “cut and kick” operation with the other joint owner, how does Verizon ensure

that it undertakes the requested work in a timely manner (i.e., within 60 days)? Are there any such requests outstanding in excess of 180 days? One year? Two years?

Staff 3-39

All: To the extent that the information requested in this request has been supplied in a previous response, please supply a reference. The National Electrical Safety Code requires inspections, record keeping, and timely correction of defects found during inspections. (If you disagree with this interpretation, please supply your interpretation of the National Electrical safety Code and a detailed rebuttal of the position stated herein). For poles, clearances, broken guy wires, slack guy wires, or defective attachment hardware, please supply, by year, for the years 2000 through 2005 inclusive:

- a) The frequency at which these inspections are performed
- b) The percentage of the system inspected and how that percentage is calculated
- c) The priority for replacement given including any time requirements
- d) A copy of the inspection sheet (or screens) used by the inspector
- e) A description of the method on how you track the deficiencies noted and completion progress
- f) The backlogs at year end for each item.

Staff 3-40

Verizon only: With regard to Verizon's response to Staff 1-12, please provide the definition of "ongoing and regular" as used in the first sentence of the response. Please describe every method employed by Verizon on an "ongoing and regular basis" to inspect poles other than when a pole is climbed.

Staff 3-41

Verizon only: Please provide a list of all poles climbed by Verizon technicians in each of the last five years.

Staff 3-42

Verizon only: If poles have been identified as unsafe and designated "condemned" by the method described in Verizon's response to Staff 1-12, how does Verizon ensure that the identified unsafe pole has been adequately addressed if, according to Verizon's response to Staff 1-14, Verizon is unable to identify work orders to replace condemned poles?

Staff 3-43

Verizon only: Please indicate whether Verizon has, in each of the last five years, and is currently, conducting inspections of all jointly owned poles in each of its maintenance areas in New Hampshire. If not, please indicated for which time periods and/or which maintenance areas it has not conducted or is no longer conducting such inspections.

Staff 3-44

Verizon only:

a) Is Verizon conducting inspections in its maintenance areas in Unitil's service areas according to the terms of IOP #16 of the Intercompany Operating Procedures between Unitil and Verizon, dated November 1, 1996? If yes, please provide all documentary evidence of such inspections over the past five years.

b) Are all poles in Verizon's maintenance area of Unitil's service area inspected by Verizon at or before the age of 20 years? Thereafter, are all poles in Verizon's maintenance area in Unitil's service area inspected by Verizon at intervals not to exceed 10 years? How does Verizon ensure that all poles in its maintenance area are inspected in accordance with IOP # 16 and NESC 214A?

Staff 3-45

Verizon only: Please provide all documentary evidence of the frequency of Verizon's inspections of jointly owned poles in Verizon's maintenance areas.

Staff 3-46

Verizon only: Please reference the response provided by Verizon to Staff 1-12: Please explain how, simply through its "normal course of business," and without a "set pole inspection schedule," Verizon is able to ensure that all of the jointly owned poles in its maintenance areas are inspected at regular intervals.

Staff 3-47

Verizon only: Please reference the response provided by Verizon to Staff 1-17: Please provide copies of all "notices posted by foremen in respective coverage offices" regarding "hazardous pole conditions" in your possession for those garages that support work in Unitil's service area (seacoast and capital service areas).

Staff 3-48

Verizon only: Reference your response to Staff 1-23: Is it Verizon's position that the absence from its union contract of provisions concerning the use of qualified third-party contractors to address safety concerns excuses the company from its obligations to address those safety concerns in a timely manner when its internal workforce is insufficient or unable to respond?